

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

VIRTAMOVE, CORP.,  
Plaintiff,

V.

HEWLETT PACKARD ENTERPRISE  
COMPANY,  
Defendants.

VIRTAMOVE, CORP.,  
Plaintiff,

V.

INTERNATIONAL BUSINESS  
MACHINES  
CORP.,  
Defendants.

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Case No. 2:24-cv-00093-JRG  
(Lead Case)

## JURY TRIAL DEMANDED

Case No. 2:24-CV-00064-JRG  
(Member Case)

## JURY TRIAL DEMANDED

**JOINT MOTION TO REPLACE VIRTAMOVE, CORP.'S SUR-REPLY (DKT. 93)**  
**WITH NEW VERSION**

Plaintiff Virtamove, Corp. (“Plaintiff”) and Defendant International Business Machines Corp. (“Defendant”), (collectively, the “Parties”) jointly move the Court to replace the as-filed version of Dkt. 93, which is VirtaMove Corp.’s Sur-Reply to IBM Corp.’s Motion to Transfer (Dkt. 78), with the attached version, and that the replacement sur-reply brief be considered by the Court in lieu of the previously filed version. The Parties make this request to avoid a dispute.

Dated: November 26, 2024

Respectfully submitted,

By: /s/ Reza Mirzaie

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document was filed electronically in compliance with Local Rule CV-5(a) and served via email on all counsel of record on this November 26, 2024.

/s/ Reza Mirzaie

**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that pursuant to Local Rule CV-7(h) counsel for Defendant has conferred with counsel for Plaintiff and the relief requested in this motion is joint.

/s/ Reza Mirzaie